

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JANE DOE,

Plaintiff,

15-CV-9137 (JGK)

-against-

CITY OF NEW YORK; New York City  
Department of Corrections Officer  
FIGUEROA, in his individual capacity, New  
York City Department of Corrections Officer  
PEARON/PARSON, in his individual  
capacity,

Notice of Motion

Defendants.  
-----X

**NOTICE OF MOTION FOR AN ORDER  
ALLOWING PLAINTIFF TO PROCEED  
ANONYMOUSLY**

Please take notice that upon the motion of attorney Robert Marinelli, the memoranda of law submitted herewith, and upon all prior pleadings, plaintiff will move this Court, Hon. John G. Koeltl, at the United States District Courthouse, 500 Pearl Street, New York, New York, on a time and date to be determined by the Court, for an Order allowing plaintiff to prosecute this matter anonymously, or in the alternative, seal this case, and such other and further relief as this Court deems just.

DATED: January 4, 2016  
New York, New York

By: /s  
Robert Marinelli, Esq.  
305 Broadway, 9<sup>th</sup> Floor  
New York, NY 10007  
(212) 822-1427

To: Mark Zuckerman  
Assistant Corporation Counsel  
100 Church Street  
New York, N.Y. 10007